

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 22-221 DWF

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON ROBERT OTTO,

Defendant.

INFORMATION

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(b)(1)

18 U.S.C. § 2253(a)

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1
(Distribution of Child Pornography)

On or about October 13, 2019, in the State and District of Minnesota, the defendant,

JASON ROBERT OTTO,

did knowingly distribute a visual depiction using a means and facility of interstate and foreign commerce and that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means including by cellular telephone or computer device, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit:

Computer File Name	Description
Mom and Daughter Full Love (cropped).mp4	A video, 33 minutes and 17 seconds in length, depicting an adult female performing oral sex on a prepubescent girl. During the video, the adult female uses a foreign object to vaginally and anally penetrate the prepubescent girl. The prepubescent girl then performs oral sex on and vaginally penetrates the adult female with a foreign object.



all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

FORFEITURE ALLEGATIONS

Count 1 this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant,

JASON ROBERT OTTO,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to the following:

- a. Toshiba 1GB HD Dell laptop (Service Tag 5Z3KZF2) with 1 Kodak 512MB SD card;

- b. Samsung Galaxy S4 (phone model SCH-I545, IMEI: 990004529528584);
- c. Western Digital Hard Drive; (S/N WXG0A59K8802)
- d. Seagate 500 GB Hard Drive; (S/N 5VEMZ7X3)
- e. 32GB Sandisk SD card; and
- f. Samsung Galaxy S7 (phone model SM-G930V IMEI: 359775076887437).

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1), and 2253(a).

Date: September 9, 2022

ANDREW M. LUGER
United States Attorney

s/ Evan B. Gilead

BY: EVAN B. GILEAD
Assistant United States Attorney
Attorney ID No.: 95971 FL